

1
2
3
4
5
6
7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 KING COUNTY,

11 Plaintiff,

12 v.

13 ACE AMERICAN INSURANCE
14 COMPANY,

15 Defendant.

Case No. 2:18-cv-01886-RSM

**JOINT STIPULATION AND ORDER
FOR CONTINUANCE OF
SUMMARY JUDGMENT MOTION
AND BRIEFING SCHEDULE TO
ALLOW FOR CROSS-MOTION BY
DEFENDANT**

16 COME NOW the Parties herein, by and through their attorneys of record and based on
17 agreement on October 8, 2019, hereby stipulate to the continuance of Plaintiff's Motion for
18 Partial Summary Judgment re Timeliness of Claims (Dkt. #17) from its currently noted date of
19 October 18, 2019 to November 22, 2019 in order to allow for Defendant ACE American
20 Insurance Company to bring a cross-motion for summary judgment on the same issues raised in
21 Plaintiff's Motion for Partial Summary Judgment and to allow King County to depose former
22 ACE Adjuster Adrienne Benzoni.

23 The Parties have agreed that Plaintiff will re-note its Motion for Partial Summary
24 Judgment for November 22, 2019. Defendant will file a joint opposition/cross-motion for
25 summary judgment with an enlarged page count, allowing for 12 extra pages according to Local
26 Rule 7(k), which shall be filed no later than October 25, 2019. Plaintiff's response to the cross-
27 motion/reply will be due November 18, 2019, and shall be limited to twenty (20) pages.

JOINT STIPULATION AND ORDER - 1
Case No. 2:18-cv-01886-RSM

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WA 98111-9402
206.223.7000 FAX: 206.223.7107

1 Defendant's Reply specific to its cross-motion will be due November 22, 2019, and will be
2 limited to eight (8) pages.

3 The new joint briefing schedule for Plaintiff's Motion for Partial Summary Judgment re:
4 Timeliness of Claims and Defendant's Cross-Motion for Summary Judgment re Suit Limitations
5 is outlined below:

6 Defendant's Opposition to Plaintiff's Motion October 25, 2019
7 for Partial Summary Judgment/Cross-Motion
8 for Summary Judgment Page limit (36)

9 Plaintiff's Opposition to Cross-Motion/Reply November 18, 2019
10 in Support of Motion Partial Summary
Judgment Page limit (20)

11 Defendant's Reply in Support of Cross-Motion November 22, 2019
12 for Summary Judgment
Page limit (8)

13 DATED this 8th day of October, 2019

14 LANE POWELL, PC

15 By: /s/ Jennifer M. Beyerlein
16 Jennifer Beyerlein, WSBA No. 35754
17 1420 Fifth Avenue Suite 4100
Seattle, WA 98101
18 beyerleinj@lanepowell.com
Telephone: 206.223.7000
Facsimile: 206.223.7107

19 *Attorneys for Plaintiff King County*

20 COZEN O'CONNOR

21 By: /s/ William F. Knowles
22 William F. Knowles, WSBA No. 17212
23 999 Third Avenue, Suite 1900
Seattle, WA 98104
24 wknowles@cozen.com
25 Telephone: 206-340-1000
Facsimile: 206-621-8783

26 *Attorneys for Defendant ACE American Insurance*
27 *Company*

1 **ORDER**

2 Based on the foregoing Stipulation between the parties,

3 IT IS SO ORDERED this 9th day of October 2019.

4 

5 RICARDO S. MARTINEZ
6 CHIEF UNITED STATES DISTRICT JUDGE

7
8
9
10 Presented by:

11 LANE POWELL PC

12
13 By s/Jennifer M. Beyerlein
14 Jennifer M. Beyerlein, WSBA #35754
15 Attorneys for Plaintiff